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E.B. Docket No. 06-36

Annual 64.2009(e) CPNI Certification for 2014 covering the prior calendar year 2013.

Received & Inspected

FEB 24 2014

1. Date filed: 2/18/14

2. Name of company(s) covered by this certification: Communications Engineering Company

FCC Mail Room

3. Form 499 Filer ID: Please see attachment, Communications Engineering Co. is exempt from filing for 499

4. Name of signatory: Matt Dlouhy

5. Title of signatory: CEO

I, Matt Dlouhy, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company *has not* taken actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company *has not* received customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17, which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed

Attachments: Accompanying Statement explaining CPNI procedures

Form 499 Exemption Statement

No. of Copies rec'd
List ABCDE

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Communications Engineering Company CPNI Procedures

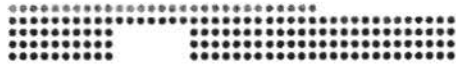
This statement serves to explain how Communications Engineering Company ("CEC") is complying with Federal Communications Commission ("FCC") rules related to the privacy of customer information. The type of information which customer privacy is protected by the FCC's rules is called "Customer Proprietary Network Information" ("CPNI"). The FCC's rules restricting telecommunication company use of CPNI are contained at Part 64, Subpart U of the FCC's rules (47 C.F.R §§ 64.2000-2009).

To the best of my knowledge, Communications Engineering Company ("the Company") is in full compliance with the FCC rules on CPNI and its requirements for the safeguarding of such customer information. The Company's operating procedures ensure that it is in compliance with the FCC's CPNI Rules because disclosure of, or permitting access to, our customers' CPNI is not allowed without obtaining the requisite customer approval, except as required by law, or the exceptions set forth in 47 U.S.C. §222, and Subpart U of Title 47 or the Code of Federal Regulations; 47 C.F.R §64.2001 through §64.2011.

The Company has assigned a Director for CPNI Compliance to serve as the central point of contact regarding the Company's CPNI responsibilities and questions related to CPNI Policy. The Director for CPNI Compliance has responsibilities including, but not limited to, supervising the training of all Company employees with access to CPNI, investigating complaints of unauthorized release of CPNI, and reporting any breaches to the appropriate law enforcement agencies in compliance with § 64.2011 of the FCC's rules. The Director for CPNI Compliance also maintains records in accordance with FCC CPNI rules, including records of any discovered breaches, notifications of breaches to law enforcement, and law enforcements' responses to the notifications for a period of at least two years. Appropriate safeguards on the use and disclosure of CPNI have been implemented in accordance with C.F.R. §64. 2009 and §64.2010. The Company has internal procedures in place to educate our employees about when they are and are not authorized to access, use, and disclose CPNI. Employees with access to CPNI are aware of the FCC's CPNI rules and are prohibited from using, disclosing or permitting access to CPNI without the appropriate customer consent or as allowed by law and the FCC rules. The Company has a disciplinary policy in place and any employee that discloses, uses, or provides unauthorized access to CPNI in violation of federal regulations is subject to disciplinary action, and possible termination.

The Company provides notice to the customer of his or her right to restrict use of disclosure of, and access to that customer's CPNI, and uses the opt-out method to solicit approval to use its customer's individually identifiable CPNI for the purpose of marketing communications-related services in compliance with §§ 64.2007 and 64.2008. The Company is aware of the requirement that notice is to be provided to the Commission within five business days of any instances where the opt-out mechanism does not work properly, to such a degree that consumers' inability to opt-out is more than an anomaly. However, no circumstances have yet required such a notification by the Company.

The Company has established a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI. The Company will maintain a record of their own and heir affiliates' sales and marketing campaigns that use their customers' CPNI, including a description of the campaign, the specific CPNI that was used in the campaign,



the date and purpose of the campaign; and what products and services were offered as part of the campaign. This record shall be maintained for a minimum of one year. Supervisory approval must be obtained of any proposed outbound marketing request for customer approval. When an existing customer calls the Company to inquire about or order new, additional, or modified services (in-bound marketing), the Company may use the customer's CPNI to assist the customer for the duration of the customer's call if the Company provides the customer with the oral notice required by 64.2008(c) and §64.2008(f) of the FCC's rules and after the Company authenticates the customer.

The Company requires express opt-in consent from a customer prior to the release of CPNI to a joint venture partner or independent contractor for marketing purposes. However, currently the Company has no joint venture partner and does not release CPNI to any third parties for marketing purposes.



Communications Engineering Company Form 499 Statement

To the best of my knowledge, Communications Engineering Company is exempt from filing FCC Form 499 based on the following from the FCC's Filing Requirements and General Instructions for filing FCC Form 499:

3. Exception for systems integrators and self-providers

Systems integrators that derive less than five percent of their systems integration revenues from the resale of telecommunications are not required to file or contribute directly to universal service. Systems integrators provide integrated packages of services and products that may include, but are not limited to computer capabilities, interstate telecommunications, remote data processing services, back-office data processing, management of customer relationships with underlying carriers and vendors, provision and maintenance of telecommunications and computer equipment, and help desk functions. Entities that provide telecommunications only to themselves or to commonly-owned affiliates need not file.